

1 Rene L. Valladares  
2 Federal Public Defender  
3 Nevada State Bar No. 11479  
4 C.B. Kirschner  
5 Assistant Federal Public Defender  
6 Pennsylvania State Bar No. 92998  
7 Margaret Lambrose  
8 Assistant Federal Public Defender  
9 Nevada State Bar No. 11626  
411 E. Bonneville Ave., Ste. 250  
Las Vegas, Nevada 89101  
(702) 388-6577  
CB\_Kirschner@fd.org  
Maggie\_Lambrose@fd.org  
Attorneys for Plaintiff Sherri L. Love

11 UNITED STATES DISTRICT COURT  
12 DISTRICT OF NEVADA

13 Sherri L. Love,

14 Plaintiff,

15 v.

16 Medical Unit E. FMWCC, *et al.*,

17 Defendants.

Case No. 2:20-cv-00525-JAD-EJY

**Stipulation and Order to Extend  
Deadlines**

18  
19 The parties stipulate that counsel for Plaintiff shall have an additional 14  
20 days, or until May 24, 2023, to serve the Omandacs, and an additional 45 days, or  
21 until July 3, 2023, to file an Opposition to the Motion for Summary Judgment. This  
22 is the first stipulation for the extension of these deadlines.  
23  
24  
25  
26  
27

1       The parties make this stipulation in good faith. Ms. Love initiated the  
2 current matter by filing a Complaint on or about March 12, 2020.<sup>1</sup> This Court  
3 appointed counsel for Ms. Love on April 7, 2023.<sup>2</sup> Indeed, counsel for Defendants  
4 and Plaintiff are all relatively new to this case, having entered their appearance on  
5 April 12 and April 17, 2023, respectively. Counsel believes there is good cause for  
6 this stipulation, as explained below.

7       Counsel for Plaintiff prepared summonses for Betty and Seymore Omandac  
8 and had their investigator attempt to serve them on May 1, 2023.<sup>3</sup> This attempt  
9 was unsuccessful because it appears they reside in a locked, gated community.  
10 Therefore, counsel's office has approved the hiring of a process serving company to  
11 effectuate service. Plaintiff's counsel are in the process of retaining a company, but  
12 need additional time to complete the necessary expenditure forms and complete  
13 service. The deadline for service is currently May 10, 2023.<sup>4</sup> Counsel for Defendants  
14 has agreed to stipulate to an extension of two weeks, until May 24th, for service to  
15 be completed.

16       Counsel for the Plaintiff also have a deadline of May 19, 2023, to file an  
17 Opposition to the Motion for Summary Judgment.<sup>5</sup> However, Plaintiff's counsel just  
18 received discovery from counsel for Defendants on April 24, 2023. Thus, Plaintiff's  
19 counsel require additional time to review those materials to adequately address the  
20 issues of disputed fact in the Opposition to the Motion for Summary Judgment.  
21 Plaintiff's counsel also need time to familiarize themselves with the lengthy history  
22 of this case (the docket currently consists of 221 entries). Plaintiff's counsel also  
23

---

24       <sup>1</sup> ECF No. 1-1.

25       <sup>2</sup> ECF No. 214.

26       <sup>3</sup> See ECF Nos. 216, 217, & 218.

27       <sup>4</sup> See ECF No. 215 at 10.

<sup>5</sup> *Id.*

1 must meet with Ms. Love to discuss the case prior to filing the Opposition. As Ms.  
2 Love is incarcerated, coordinating client meetings presents a challenge. Based on  
3 these reasons, counsel for Defendants has agreed to stipulate to an extension of 45  
4 days, until July 3rd, for the filing of the Opposition to Motion for Summary  
5 Judgment.

6 Therefore, the parties stipulate and request that the date for Plaintiff to  
7 serve the Omandacs is extended an additional 14 days, until May 24, 2023, and the  
8 deadline to file the Opposition to the Motion for Summary Judgment is extended 45  
9 days, until July 3, 2023.

10 It is so stipulated.

11  
12 Dated May 3, 2023.

13  
14 Aaron D. Ford  
Attorney General

15 /s/ Samuel Pezone Jr.  
16 Samuel Pezone Jr.  
17 Deputy Attorney General

18 Attorney for Defendants

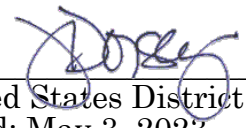
Rene L. Valladares  
Federal Public Defender

19 /s/ CB Kirschner  
20 C.B. Kirschner  
21 Assistant Federal Public Defender

22 /s/ Margaret Lambrose  
23 Margaret Lambrose  
24 Assistant Federal Public Defender

25 Attorneys for Plaintiff

26  
27 **IT IS SO ORDERED.**

  
United States District Judge  
Dated: May 3, 2023